

# **LTS Plan Workshop Questions and Comments**

## **August 28, 2002**

### ***Monitoring and Maintenance***

- J-1 | 1. Is there a possibility of spontaneous combustion in the disposal cell?

Response J-1: The concerns raised by the comments are valid for certain well-defined scenarios, most of which involve either composting protocols or disposal of organic mass in demolition or municipal landfills. The commentator references the quantity of more than 10,000 cubic yards of wood or other similar materials incorporated into the waste mass as a possible source of excessive heat generation.

Decomposition of vegetative organic mass may follow two fundamentally different biochemical processes: aerobic or anaerobic. Aerobic processes, characterized by presence of sufficient Oxygen, moisture and nutrients, are exothermal in nature. Heat in the decomposing mass raises continuously until it reaches a level unsustainable for the bacterial life. Further temperature increases, to the point of combustion, is possible solely through chemical reactions. In the absence of chemical reagents capable to sustain such reactions, the bio-mass reverts to an anaerobic decomposition process. Anaerobic processes are not exothermic and thus the temperature decreases to that of the surrounding environment.

The organic materials present in the Weldon Spring Disposal Facility were not placed in configurations that would have encouraged exothermal decomposition. All wood products were disposed in accordance with one of the following two scenarios:

1. Wood that could be chipped or otherwise similarly size reduced was composted on site and then mixed with soil in a homogeneous mixture containing no more than 30% by volume wood waste. The resulting mix behaved and was placed and compacted as regular soil.
2. Wood pieces that could not be size reduced (large root balls for example) were entombed in CSS grout or in common soil waste. In either case, they were spaced from one another in the soil mass such as no detrimental local settlement may occur. A corollary to this spacing was that no piling of combustible materials was possible.

The dispersion of organic matter in the entombing soil mass and the presence of thick and dense overlying layers of soil, synthetic liners and rock do not create favorable conditions for oxygen ventilation, the environment being lethal for aerobic bacterial decomposition. Anaerobic processes are possible and predictable, but they do not result in heat generation.

Temperature monitoring of the cell interior would be at the best futile, since no heat is expected to be produced. Additionally, since the upper clean layers are an excellent temperature buffer, any

non-intrusive monitoring would be impossible. Intrusive monitoring would compromise the integrity of the cell encapsulation system, with no evident benefits.

There is however some information regarding the cell internal temperature ranges. A second source of organic decomposition, not referenced by the commentator is the Geochemical Barrier Layer. Since this layer is directly above the primary LCRS, a temperature build-up would transfer to the leachate and would be detected in the LCRS external sump. Measurements of the leachate temperature indicate only a 50 to 60 degrees range, typical for deep soil-type of environments, buffered from external variations.

J-2 | 2. Will radiation come through the cover of the cell?

Response J-2: No. The radon barrier (i.e. the 3-foot clay layer between the waste and the liner & riprap layers) effectively stops both radiation and radon gas from penetrating through the cover of the cell. The rock layer also absorbs much of the gamma radiation emitted from the naturally occurring radioactivity present in the radon barrier. And since the rock has less naturally occurring radioactivity in it than does clay or soil, the end result is less gamma radiation present on top of the cell than in our own backyards. Gamma radiation levels have been measured on the cell steps, ramp, & platform (top), and are indeed lower than gamma radiation levels on natural soils in our area.

During construction of the radon barrier, monitoring was performed to determine the radon flux emitted from it (radon release rate). The average measured radon flux was 0.55 pCi/m<sup>2</sup>/sec, which is within the background range of radon flux naturally emitted from soils.

J-3 | 3. Who is responsible for watching for damage to the cell over time?

Response J-3: As stated in the LTS Plan, DOE will conduct annual and five-year inspections of the cell (§3.2.1). Also, the public can use phone numbers that will be posted at the site to notify DOE of any concerns (§3.3.1). Subcontractor personnel will be on site frequently each year obtaining samples from the ground water monitor wells and will report any site concerns to DOE.

J-4 | 4. Is there a plan for monitoring the Missouri River?

Response J-4: There are no surface water discharges from the site to the Missouri River. Also, groundwater from the chemical plant or quarry does not directly discharge to the Missouri River. Therefore, monitoring of the Missouri River is not necessary and is not included in the LTS Plan.

J-5 | 5. Will there be monitoring of human health effects?

Response J-5: Due to the design of the cell, there are no existing exposure risks from the encapsulated materials to the public. Also, because the ground water is not used, there is no risk

of exposure to the contaminated ground water. Therefore, monitoring of human health effects is not necessary and is not included in the LTS Plan.

- J-6 | 6. Historical monitoring well data should be available to the public.

Response J-6: Historical monitor well data is available in the site environmental reports and will be available on the LTSM website in January 2003. Yearly monitor well data and historical trends will be provided in annual reports that will be available to the public on the web and at locations noted in the LTS Plan (§3.2.5, 3.13)

- J-7 | 7. Include a table in the LTS Plan that shows each monitoring well and the results over time.

Response J-7: The LTS Plan addresses stewardship of the site after completion of remedial action activities. Therefore, summaries of the 2001 sampling activities were provided in Tables 2–5 through 2–11 as baseline values for comparison to in succeeding years. Historical monitor well data, including trends, will be made available to the public (see [response J-6](#)). A table will not be included in the LTS Plan.

- J-8 | 8. What would happen to the monitoring procedure if there is a drastic change in monitoring results? Are there triggers for changing the procedure?

Response J-8: Groundwater contingencies have been or will be developed for each operable unit addressing groundwater. These are presented in §3.9.2.

- J-9 | 9. What is background?

Response J-9: Background is radiation that is present everywhere due to both naturally-occurring and man-made sources of radiation. All living things on Earth are constantly exposed to radiation from the following naturally-occurring sources:

- The sun and other stars
- Naturally-occurring radioactivity in soil, water, and vegetation
- Naturally-occurring radioactivity in our bodies

Charged particles from the sun and other stars interact with the earth's atmosphere and magnetic field to produce radiation, some of which makes it to the earth (and to us). Soil, water, and vegetation contain naturally-occurring radioactive elements; primarily uranium, thorium, radium, and radon (a gas). We receive radiation from these sources when we eat plants and animals, drink water, and breathe. We also receive a small amount of the gamma radiation emitted continuously from these radioactive elements naturally present in the soil.

Man-made sources of radiation include:

- Televisions
- Medical x-rays
- Smoke detectors
- Nuclear medicine procedures
- Tobacco
- Building materials
- Combustible fuels (gas, coal, etc.)

The ultimate source of radioactivity in tobacco, building materials, and combustible fuels is naturally-occurring radioactivity. However, these are called man-made sources because people actually receive more radiation from them (due to their use or composition) than they would from these sources in their natural state. On average, people in the United States receive about 360 millirems per year of background radiation; the natural sources account for about 80% of the total. Natural and artificial radiations are not different in any kind or effect. Keep in mind that 1 out of 3 Americans will contract cancer during their lifetimes.

In the context of environmental cleanup, “background” is a measurement of conditions in areas not affected by the contamination. Background values are points of reference. For manmade contaminants (e.g. trichloroethylene), background is zero or more precisely analytical detection limit. For naturally occurring contaminants (e.g. uranium or radium), background is determined on a local or regional basis and can vary widely throughout the country and world. At the Weldon Spring site, background values for groundwater also vary between the Quarry area (with heavy influence from the Missouri River) and the chemical plant (with a primary source of rainwater infiltration). Background also has a range of values due to seasonal influences and analytical precision.

- J-10 | 10. Springs 6303 and 6306 are not on the LTS Plan maps or tables.

Response J-10: Sampling of springs SP-6303 and SP-6306 may not be required as part of the remedy for the GWOU ROD because these springs do not have analytes exceeding maximum contaminant levels or discharge groundwater originating from the chemical plant. However, spring SP-6303 was sampled in 2001 (Table 2–7) and will be added to Figure 2–18. Spring SP-6306 will be added to the LTS Plan to respond to citizens’ concerns.

- J-11 | 11. Include in the map legends what type of contamination exists.

Response J-11: Analytes that exceed the EPA maximum contaminant levels at the Chemical Plant area are described in §2.4.3.1 and shown on Figures 2–9 through 2–12. Uranium is the only analyte exceeding the EPA maximum contaminant level at the quarry area, and it is described in §2.4.3.2 and shown on Figure 2–15. No other analytes exceed maximum contaminant levels so they are not shown as contamination on the figures.

- J-12 | 12. Does the LTS Plan say how often the wells will be sampled?

Response J-12: Sampling frequency for the disposal cell monitor wells is provided in Table 3–4, and for the quarry monitor wells in Table 3–5. These tables also include lists of constituents that will be analyzed. Sampling frequency for the Chemical Plant area monitor wells will be determined as part of the remedy for the GWOU and will be included in the final LTS Plan; until then, sampling of the existing monitor wells will continue in accordance with the current *Environmental Monitoring Plan*.

- J-13 | 13. Nitrate concentrations exceeded drinking water standards at 36 locations. Signs should be placed at these locations and the locations should be identified in the LTS Plan.

Response J-13: The monitor wells with nitrate concentrations currently in excess of the federal drinking water standard (10 milligrams per liter) are inside the plume boundary shown on Figure 2–11, and all but one (MW–4013) occur on DOE and U.S. Army property. These wells are not used for drinking water; therefore, DOE will not place any signs indicating nitrate contamination. Institutional controls to restrict use of contaminated groundwater will be drafted for the next revision of the LTS Plan.

- J-14 | 14. Figure 2-9 should show all the contamination and not just the parameters that exceed certain levels (maximum concentration limits).

Response J-14: A constituent is not considered to be a contaminant unless it exceeds a regulatory limit. At the Chemical Plant area only uranium, TCE, nitrate, and 2,4-DNT are in concentrations exceeding regulatory limits at some of the monitor well locations. These locations are inside the contamination plumes shown on Figures 2–9 through 2–12.

- J-15 | 15. Other parameters and how often they will be monitored should be in the LTS Plan.

Response J-15: See [response J-12](#). In addition, the long term monitoring requirements for the chemical plant groundwater will be included in the LTS Plan once the ROD is signed and implemented. In the interim, the LTS Plan references the current *Environmental Monitoring Plan*.

- J-16 | 16. How much money is being funded for stewardship of the site for the first year under the Grand Junction Office?

Response J-16: \$1,000,000 has been budgeted for the site in FY03 based on the current scope of work. This covers some one-time costs and therefore subsequent year costs are estimated at \$800,000 per year.

- J-17 | 17. Who will own, operate, and maintain the Interpretive Center?

Response J-17: DOE owns and will continue to own the Chemical Plant property (§2.1.1), which includes the Interpretive Center. As stated in §3.5, DOE will remain responsible for maintenance and capital improvements of the building. It is planned for St. Charles County to use the building and perform maintenance and improvements under a use permit. DOE will staff the building for two years and then re-evaluate staffing.

- J-18 | 18. How is the leachate being transported and what does Metropolitan St. Louis Sewer District do with it?

Response J-18: The leachate is being hauled to MSD via waste hauling trucks to the MSD Bissell Point Off-loading Facility. MSD consolidates the WSS disposal facility leachate with their other customers hauled leachate. It is worth noting that the leachate is being hauled to MSD for treatment of manganese and not uranium or other radionuclides. The leachate is already below any concentration (or activity) that requires any treatment for radionuclides.

- J-19 | 19. LTS Plan should indicate that DOE will pay the cost if the county well field has to be relocated.

Response J-19: DOE has committed to bear any expense relative to ensuring a safe and clean drinking water supply from either the present well field or from an alternate source. Note that DOE's liability extends only to protection from contaminants for which the Department is responsible. DOE cannot tie up funds for contingency over multiple fiscal years but does have discretionary monies available to use if necessary.

- J-20 | 20. Will DOE monitor the structural stability of the Frog Pond Outlet culvert?

Response J-20: No. Monitoring of the condition of the twin culverts under County Route D and the Southeast Drainage culvert under state Highway 94 is the responsibility of the Missouri Department of Transportation. As indicated in §3.7, DOE inspectors will look for signs of disturbance around the culverts on an annual basis, and will contact appropriate authorities every five years to remind them of the contamination left in place. Institutional controls will be in place requiring notification to DOE of roadway or utility improvements involving the culverts in order to provide proper disposal of soils (Table 2-12).

- J-21 | 21. Who will approve monitor well abandonment in the future (e.g., DOE, EPA, Missouri Department of Natural Resources)?

Response J-21: Changes to the long-term monitoring networks will be made in consultation with the EPA (§3.1). DOE will recommend monitor well abandonment based on evaluation of ground water quality and attainment of long term monitoring goals.

- J-22 | 22. Would DOE discontinue monitoring the disposal cell wells if the ground water cleans up?

Response J-22: The disposal cell monitor wells are intended to monitor for leaks from the disposal cell and, therefore, their purpose and usefulness are not governed by cleanup of the ground water in the Chemical Plant area.

- J-23 | 23. Will DOE continue to ensure that county production wells are monitored for WSSRAP contaminants?

Response J-23: St. Charles County monitors their well field production wells for contaminants associated with the quarry (radionuclides, nitroaromatics, arsenic, barium, and sulfate), supported through a DOE grant. Funding for this grant is included in the annual cost estimate for stewardship activities.

## ***Land Use and Institutional Controls***

- J-24 | 1. Does the county already have land use restrictions? Can the county designate restrictions?

Response J-24: St. Charles County can restrict land use through zoning. County zoning authority does not extend to state or federal land. DOE is working with the state and county governments to establish legally enforceable land use restrictions which will “run with the land” in the event ownership changes in the future. These issues will be the focus of a public work session this fall.

- J-25 | 2. Are restrictive easements subject to state laws? Will DOE work with the state on these restrictions?

Response J-25: See [response J-24](#).

- J-26 | 3. DOE should annually publish a list of institutional controls for the public.

Response J-26: After institutional controls are approved, they will be listed in Appendix B of the LTS Plan which will be posted on the web and available at the Interpretive Center and local library.

- J-27 | 4. Define recreational versus residential use in the LTS Plan.

Response J-27: DOE will provide these definitions in the LTS Plan. The specific restrictive language proposed for the institutional controls will be provided in the next version of the LTS Plan.

- J-28 | 5. Plan should describe in detail how site will be controlled through federal ownership.

Response J-28: As stated in §2.1.1, DOE owns the Chemical Plant and quarry parcels. As owner, DOE or a successor federal government agency will control how their land is used in perpetuity (§2.6 and Table 2–12). See also [response to J-27](#).

- J-29 | 6. Clarify how control stays with ownership, but doesn't change with transfer of land.

Response J-29: Deed restrictions and other instruments will be recorded in the records of St. Charles County. These instruments will stay with the associated parcel of land so, if a parcel is sold or transferred, the new owner will be required by law to abide by the requirements of the institutional control instruments (§2.6). DOE will monitor the effectiveness of the institutional controls.

- J-30 | 7. How will certain future uses of the land be stopped?

Response J-30: DOE will monitor the effectiveness of the institutional controls and apply legal resources to stop or reverse uses which violate the legal restrictions.

- J-31 | 8. What will happen if some land is sold to a private party?

Response J-31: See [response J-29](#).

- J-32 | 9. DOE should file documents with the state and county to ensure land cannot be sold to a commercial entity.

Response J-32: Property can be used by a commercial entity as long as the institutional controls are not violated.

- J-33 | 10. The conservation areas are surrounded by urban areas—the land cannot be allowed to be sold.

Response J-33: See [response J-32](#).

- J-34 | 11. Are locations requiring institutional controls marked? The public needs to know what and where contamination is present, and the associated individual risk of that contamination.

Response J-34: Locations requiring institutional controls are not marked. The proposed institutional controls will be protective of human health and the environment, and the risk assessment demonstrates that the public will not be at risk during recreational activities in areas affected by institutional controls.

- J-35 | 12. DOE should install signage to let future generations know what institutional controls are in place.

Response J-35: See [response J-34](#).



J-36 | 13. Is there a “No Trespassing” sign on the property?

Response J-36: All DOE property, except the leachate treatment building, is open to the public.

J-37 | 14. Was land remediated to a certain depth or was it remediated until background levels were reached? This information should be in the LTS Plan and on the web.

Response J-37: As indicated in §2.3, excavation of contaminated soils continued until soils were remediated to cleanup standards. These standards were not set at background values, but the remediation exceeded the requirements and the average concentrations of contaminants in the soil were very close to background values.

J-38 | 15. What is DOE doing to address the remaining contamination? DOE needs to provide details in the LTS Plan (e.g., locations of elevated concentrations, when and how often these locations are going to be monitored).

Response J-38: Remaining contamination is identified in §2.3. Current and proposed institutional controls to protect the public and the environment at locations of remaining contamination are described in §2.6 and will be fully detailed in Appendix B following required approvals. Monitoring of locations affected by institutional controls is described in §3.7. Groundwater at the chemical plant will be addressed under the CERCLA process.

J-39 | 16. What is in place to prevent reckless recreational use at the cell, such as racing an SUV up the cell?

Response J-39: A guardrail is in place around the base of the cell to prevent vehicular access to the cell (§2.8.1). A sign will be placed at the bottom of the cell stairway instructing the public to stay within the designated walkway and prohibiting the use of motorized vehicles on the rock cover.

J-40 | 17. Is it safe to eat fish from the local lakes?

Response J-40: Yes. The human health risk associated with ingesting fish from Lakes 34, 35, and 36, with elevated levels of uranium is within the acceptable risk range established by EPA. As a result of this assessment, no limits have been placed on human consumption of fish from the August A. Busch Memorial Conservation Area.

The Agency for Toxic Substances and Disease Registry (ATSDR) also conducted a Health Assessment in 1997 which concluded that contaminant concentrations in fish are very low, and recreational consumption of fish from the conservation areas does not pose a public health hazard. This assessment published by the ATSDR is *entitled Public Health Assessment for the Weldon Spring Quarry/Plant/Pits (USDOE) St. Charles, St. Charles County, Missouri CERCLIS NO. MO3210090004 – June 30, 1997.*

- J-41 | 18. DOE commits to defining institutional controls in the next draft of the LTS Plan (projected for January 2003).

Response J-41: Yes.

- J-42 | 19. The LTS Plan should include explanation for how institutional controls boundaries were established.

Response J-42: Text will be provided in the next draft of the LTS Plan.

- J-43 | 20. Will DOE consider new technologies in the future that might treat contaminants rather than just monitor them?

Response J-43: During the CERCLA 5-year review, the conditions are evaluated and if still protective, the remedy remains. However, if it is determined that conditions are not protective, evaluation of new technologies will be made. If new technologies would be more cost effective than those in existing remedies, they would be evaluated.

## ***Communications***

- J-44 | 1. Are the annual reports going to be available to the public? Will they be available at the Interpretive Center?

Response J-44: Annual reports will be available to the public on the GJO web site, at the Interpretive Center, and other locations as indicated in §3.2.5 and 3.13.

- J-45 | 2. How often will DOE revise the LTS Plan after it is finalized? How will DOE incorporate public participation?

Response J-45: DOE will revise the plan, with concurrence of the EPA and the state, if procedural changes are warranted to maintain the objectives of site stewardship (§3.1). Potential changes would be made based on evaluations of ground water data, the results of annual and 5-year inspections, and any changes that could affect protectiveness of the public health and the environment. Consequently, there is no set frequency for revisions to the plan.

- J-46 | 3. DOE should hold annual public meetings to discuss site status. These meetings need to be effectively announced.

Response J-46: Text will be revised to indicate that DOE will hold annual public meetings to discuss site status.

- J-47 | 4. Provide user-friendly yearly status information (e.g., Fact Sheet), by mail and on web.

Response J-47: Site status information, including annual reports and a Fact Sheet, will be provided on the GJO web site and in the Interpretive Center. The list of stewardship documents provided in §3.13 will be revised to include an annual Fact Sheet.

- J-48 | 5. Put a summary of annual information on the web.

Response J-48: See responses [J-44](#) and [J-47](#).

- J-49 | 6. Put documents referenced in the LTS Plan on the web.

Response J-49: All DOE site documents referenced in the LTS Plan will be placed on the LTSM Program website for Weldon Spring.

- J-50 | 7. There are too many references to other documents in the LTS Plan.

Response J-50: The documents referenced in the LTS Plan are the source documents for factual information or data provided in the LTS Plan, and guidance documents that drive the required LTS activities. References enable the reader to find additional supporting information that is inappropriate to include in the LTS Plan. Copies of the referenced DOE site documents will be available in the Interpretive Center and on the LTSM Program website for Weldon Spring. Other referenced federal and state guidance documents (DOE Orders, EPA documents, Codes of Federal Regulations, Codes of State Regulations, etc.) can be found on respective government websites.

- J-51 | 8. LTS Plan should include a list of associated documents, a summary of what they contain, and where they are located. This list could be included as an appendix.

Response J-51: All referenced documents that were used in the preparation of the LTS Plan are listed in §4.0. The listed references include document title and date. Document contents can be ascertained by the title and the context in which the document was referenced. Copies of the referenced site documents will be available in the Interpretive Center and on the LTSM Program website for Weldon Spring.

- J-52 | 9. Put important facts sheet in LTS Plan.

Response J-52: As indicated in the [response J-47](#), an annual Fact Sheet will be made available to the public. This Fact Sheet will change to incorporate the results of annual site activities and conditions; therefore, a Fact Sheet is not planned for inclusion in the LTS Plan.

- J-53 | 10. How long after data acquisition will it be before the public gets the results?

Response J-53: Due to the extensive network of ground water monitoring wells and the varying frequencies that samples are collected, ground water sampling activities occur throughout the year. Depending on the constituents being analyzed, sample analysis may take up to one month. The process of validating analytical data begins when the data are received from the laboratory. Following validation, the data are entered into a database and on the web. Data validation and posting normally is completed within approximately 60 days after laboratory analyses are completed. Therefore, in most cases the public will have access to the data through the web within 90 days of sample collection. Also, annual monitoring results and historical trend analyses will be included in the annual report which will be posted on the web.

- J-54 | 11. Who will be notified of unusual or unexpected monitoring results and when? Will the Department of Health be notified?

Response J-54: §3.9 of the LTS Plan will be revised to clarify notification procedures. DOE anticipates its primary obligations will be to notify EPA, MDNR and St. Charles County. MDNR will decide whether to notify the Department of Health.

- J-55 | 12. What kind of event would result in an immediate notification to the public by DOE?

Response J-55: As stated in second paragraph of §3.9, an emergency would constitute “unusual damage or disruption” that threatens or compromises site safety or security. This paragraph will be revised to define an emergency as an occurrence that has the potential to expose the contents of the cell. The third paragraph of this section will be moved to the end of the second paragraph and revised to say that DOE will begin notifications to the EPA, state, and county as soon as an emergency situation is known to exist. DOE must work with local response authorities for public notification and will not notify the public directly.

- J-56 | 13. How does the public report vandalism or other concerns at the site? Put contact information in the LTS Plan.

Response J-56: Phone numbers will be posted at the interpretive center to enable the public to notify DOE of site concerns (§3.3.1). §3.3.1 will be revised to clarify that the public can also contact on-site DOE personnel or the St. Charles County Sheriff’s Department with concerns.

- J-57 | 14. Add emergency 800 number to federal section of the phonebook.

Response J-57: Agree. DOE has established a toll-free phone number for the Weldon Spring site (877-695-5322, see Section 2.8.1). DOE will list the number in local phone directories and post it at the site.

- J-58 | 15. LTS Plan should include procedure for how to ask for information.

Response J-58: The LTSM Program 24-hour and local phone numbers will be provided at the site as indicated in §2.8.1. Site information will also be available to the public on the GJO web site and at the Interpretive Center (§3.13).

- J-59 | 16. Provide ground water contamination trend information.

Response J-59: Historical monitor well data will be available on the LTSM website, including trend information. Yearly monitor well data and historical trends will be provided in annual reports that will be available to the public on the web and at locations noted in the LTS Plan (§3.2.5, 3.13)

- J-60 | 17. The LTS Plan should indicate that the ground water will be addressed further in the Record of Decision and that the public will comment on the Record of Decision.

Response J-60: In §3.6.1.2 it is indicated that ground water at the Chemical Plant area will continue to be monitored in accordance with the current Environmental Monitoring Plan until the Record of Decision is approved and the remedy has been implemented. Under CERCLA the public will be able to review and comment on the Proposed Plan for the groundwater operable unit.

- J-61 | 18. LTS Plan should clarify that no runoff from the site enters the drinking water supply.

Response J-61: §2.1.2 indicates that surface water from the site watersheds is not used for a public drinking water supply.

- J-62 | 19. Has the risk assessment data been made public? Where can it be found? How thick are the risk assessments that have been done in the past 2 years? The risk assessments should be summarized in the LTS Plan.

Response J-62: Copies of risk assessments will be available for review at the Interpretive Center and can be viewed on the LTSM Program website. Summaries of risk assessments will be provided in §2.2.2 and §2.3.

- J-63 | 20. Can a copy of the risk assessments be delivered to the local library within a week? Site documents should be made available in more than one location.

Response J-63: See [response J-62](#).

- J-64 | 21. The cell is an “attractive nuisance” and this aspect should be addressed in the LTS Plan.

Response J-64: A guardrail is in place around the base of the cell to prevent vehicular access to the cell (§2.8.1). A sign will be placed at the bottom of the cell stairway instructing the public to stay within the designated walkway and prohibiting the use of motorized vehicles on the rock

cover. These precautions address personal safety (injuries due to walking on the irregular rock surface) and maintenance (repair of the cell cover) issues. The public will not be affected by the radiological material encapsulated within the cell.

As stated in the LTS Plan, DOE will conduct annual and five-year inspections of the cell (§3.2.1). Also, the public can use phone numbers that will be posted at the site to notify DOE of any concerns (§3.3.1). Subcontractor personnel will be on site frequently each year obtaining samples from the ground water monitor wells and will report any site concerns to DOE. Additionally, DOE will maintain an on-site presence in the Administration Building and the Interpretive Center for approximately two years and will be cognizant of daily activities at the site during that time.

- J-65 | 22. Define technical terms in the LTS Plan, such as “rapid headward cutting.”

Response J-65: Technical terms will be defined in the LTS Plan either in the text or in footnotes.

- J-66 | 23. Continue Citizens Commission.

Response J-66: DOE plans to provide funds for the Weldon Spring Citizens Commission (WSCC) through finalization of the Ground Water Operable Unit Record of Decision and the LTS Plan. Long term stewardship cost estimates also include funding for the WSCC.

- J-67 | 24. What would be the effect of a fully loaded (with fuel), large aircraft crashing into the cell? What would rescuers have to wear?

Response J-67: DOE is evaluating the potential for terrorist threats and will address this in the next version of the LTS Plan.